



January 24, 2020

VIA ECF

**Michael J. Broadbent**

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Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

**Re: Abraham v. Leigh, et al; No. 1:17-cv-05429**  
**Letter Motion to Request Permission to File Under Seal**

Dear Judge Failla:

As the Court is aware, we represent Defendant Abby Leigh, as Executrix of the Estate of Mitch Leigh, in the above-referenced action. We are filing today the Executrix's Motion for Summary Judgment, together with its supporting documents ("MSJ Filing"). The MSJ Filing includes exhibits drawn from material marked as confidential by other parties as well information regarding those exhibits and other confidential information. The Executrix seeks to file such documents under seal, and to redact such information in the Statement of Undisputed Facts and Memorandum of Law filed with the MSJ Filing. Because the confidentiality asserted belongs to other parties, we are not submitting a confidentiality Declaration or citation to case law supporting the redactions and filing under seal.

We thank the Court for its attention to these matters.

Sincerely,

COZEN O'CONNOR

/s/ Michael J. Broadbent

BY: MICHAEL J. BROADBENT

CC: All counsel of record via ECF

Application GRANTED.

Dated: January 24, 2020  
New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE

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